

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**-----X  
LONNIE KNOX,

Plaintiff,

-against-

L M C TRUCKING CORP. and JORGE A. PANCHAME,

Defendants.  
-----X

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's Attorney within 20 days after service of this summons, exclusive of the day of service (or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against by default for the relief demanded in the complaint.

Dated: Melville, New York  
January 14, 2022

Yours, etc.,

**ZLOTOLOW & ASSOCIATES, P.C.***Attorneys for Plaintiff*

58 South Service Road, Suite 130

Melville, New York 11747

Tel: (631) 396-7400

**By: Jason S. Firestein, Esq.**JFirestein@zlotlawyers.com**DEFENDANTS' ADDRESSES:****JORGE A. PANCHAME**

6802 Edgemere Drive

Temple Hills, MD 20748

VTL 253 Service

**L M C TRUCKING CORP.**175 Nelson Avenue, 1<sup>st</sup> Floor

Jersey City, New Jersey 07307

VTL 253 Service

**PLEASE FORWARD THIS LEGAL DOCUMENT TO PROGRESSIVE INSURANCE**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

-----X  
LONNIE KNOX,

Plaintiff,

Index No.:

-against-

**VERIFIED COMPLAINT**

L M C TRUCKING CORP. and JORGE A. PANCHAME,

Defendants.  
-----X

Plaintiff, by his attorneys, Zlotolow & Associates, P.C., as and for his Verified Complaint against the Defendants, alleges upon information and belief as follows:

1. That at all times hereinafter mentioned, Plaintiff, LONNIE KNOX, was and still is a resident of the County of New York, State of New York.

2. That at all times hereinafter mentioned, Defendant, JORGE A. PANCHAME, was and still is a resident of the State of Maryland.

3. That at all the dates and times hereinafter mentioned, the Defendant, L M C TRUCKING CORP. was a foreign corporation, incorporated in the State of New Jersey.

3a. That at all times hereinafter mentioned, the Defendant, L M C TRUCKING CORP. ["LMC"], transacted business within the State of New York.

4. That at all times hereinafter mentioned, the Defendant LMC operated a trucking business under US DOT Number 2435547.

5. That at all times hereinafter mentioned, the Defendant LMC operated a trucking business under US DOT Number 2435547 which was authorized to be hired and engage in the interstate transportation of property.

6. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant LMC owned a 2016 Hino truck bearing New Jersey license registration number XFYG66.

7. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant LMC owned a 2016 Hino truck bearing vehicle identification number ["VIN"] 5PVNJ8JV8G4S62279.

8. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, operated a 2016 Hino truck bearing New Jersey license registration number XFYG66.

9. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, operated a 2016 Hino truck bearing VIN number 5PVNJ8JV8G4S62279.

10. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, was an employee of Defendant LMC.

11. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, operated a 2016 Hino truck bearing New Jersey license registration number XFYG66 with the permission of Defendant LMC.

12. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, operated a 2016 Hino truck bearing New Jersey license registration number XFYG66 in the scope of his employment with Defendant LMC.

13. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, operated a 2016 truck bearing VIN number 5PVNJ8JV8G4S62279 with the permission of Defendant LMC.

14. Upon information and belief, at all the dates and times hereinafter mentioned, the Defendant, JORGE A. PANCHAME, operated a 2016 truck bearing VIN number 5PVNJ8JV8G4S62279 in the scope of his employment with Defendant, LMC.

15. On October 14, 2021, Plaintiff, LONNIE KNOX was operating a vehicle bearing New York State registration number 50085PC on the Cross-Bronx Expressway at and around its interchange with Jerome Avenue in the County of Bronx, State of New York.

16. On October 14, 2021, the 2016 Hino truck bearing New Jersey license registration number XFYG66 and the vehicle bearing New York registration number 50085PC were in contact with each other at and around the aforementioned location.

17. On October 14, 2021, the 2016 Hino truck bearing VIN number 5PVNJ8JV8G4S62279 and the vehicle bearing New York registration number 50085PC were in contact with each other at and around the aforementioned location.

18. That the aforementioned accident was due to the negligence, carelessness, and/or recklessness of the Defendant, JORGE A. PANCHAME.

19. That the Defendant LMC is vicariously liable for the negligent acts of the Defendant, JORGE A. PANCHAME.

20. That the Defendant, LMC is vicariously liable for the negligent acts of the Defendant, JORGE A. PANCHAME pursuant to New York Vehicle and Traffic Law Section 388.

21. That the Defendant, LMC is vicariously liable for the negligent acts of the Defendant, JORGE A. PANCHAME pursuant to the doctrine of *respondeat superior*.

22. That on October 14, 2021, the aforementioned accident caused the Plaintiff, LONNIE KNOX to be injured, by reason of the negligence, carelessness and recklessness of the

Defendants in the ownership, operation, maintenance, repair and control of their aforementioned 2016 Hino truck.

23. As a result of the foregoing, the Plaintiff, LONNIE KNOX, was caused to be rendered sick, sore, lame and disabled; was caused to suffer great pain; was and is internally and externally injured; will continue to endure great pain and suffering; and has sustained and will continue to sustain general and special damages, economic losses, and non-economic losses.

24. That the Plaintiff LONNIE KNOX, as a result of the foregoing accident, and to the extent required by law is required by to so prove, has sustained economic loss greater than basic economic loss and/or serious injury as defined in the Insurance Law of the State of New York.

25. That this action falls under one or more of the exceptions contained in C.P.L.R. Section 1602.

**WHEREFORE**, the Plaintiff demands judgment against the Defendants, jointly and severally, awarding damages in an amount exceeding the monetary jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with interest and the costs and disbursements of this action, and such other and further relief as to this Court seems just and proper.

Dated: Melville, New York  
January 14, 2022

Yours, etc.,

**ZLOTOW & ASSOCIATES, P.C.**

*Attorneys for Plaintiff*

58 South Service Road, Suite 130

Melville, New York 11747

Tel: (631) 396-7400

**By: Jason S. Firestein, Esq.**

[JFirestein@zlotlawyers.com](mailto:JFirestein@zlotlawyers.com)

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF SUFFOLK    )

Jason S. Firestein, Esq., an attorney admitted to practice in the Courts of New York. I am the attorney of record for Plaintiff in the within action.

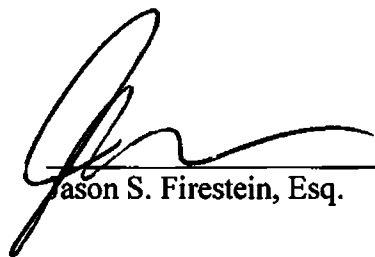
Deponent has read the foregoing **SUMMONS AND COMPLAINT**, and knows the contents thereof; the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters, deponent believes it to be true. There verification is made by deponent and not by Plaintiff, because Plaintiff does not reside within the County where your affiant maintains his office.

The grounds of deponent's belief as to all matters not stated upon deponent's knowledge are as follows:

Investigation and information contained in affiant's file.

The undersigned affirms that the foregoing statements are true, under penalties of perjury.

Dated: Melville, New York  
January 14, 2022

  
\_\_\_\_\_  
Jason S. Firestein, Esq.

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

Index No.:

---

LONNIE KNOX,

**Plaintiff,**

**-against-**

L M C TRUCKING CORP. and JORGE A. PANCHAME,

**Defendants.**

---

**SUMMONS AND VERIFIED COMPLAINT**

---

**ZLOTOLOW & ASSOCIATES, P.C.**

*Attorneys for Plaintiff*  
58 South Service Road, Suite 130  
Melville, New York 11747  
(631) 396-7400